

**Federal Defenders
OF NEW YORK, INC.**

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November 10, 2020

BY ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Application Granted. The Clerk of the Court is directed to terminate the letter motion at docket number 49.

Dated: November 12, 2020
New York, New York

**Re: United States v. Joseph Bagaglia,
19 Cr. 342 (LGS)**



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

I write to request a temporary modification of Mr. Bagaglia's home-detention bail condition to permit him to spend Thanksgiving day with his family at his sister's house in New Jersey. His sister's address and phone number have already been provided to Pretrial Services. Mr. Bagaglia's mother, sister, brother, brother-in-law, nephews, and grandmother will be in attendance. The family is aware of Mr. Bagaglia's bail conditions and will supervise him.

Mr. Bagaglia proposes to leave his mother's home at noon on Thursday, November 26, and to return by 9:00 p.m. that evening. Neither Pretrial nor the government objects to this request.

Respectfully submitted,
/s/

Clay H. Kaminsky
Assistant Federal Defender
Federal Defenders of New York
(212) 417-8749 / (646) 842-2622

cc: AUSA Sarah Kushner
USPTO Acheme Amali (by email)